The Eastern Distric	ct, court of Pennsylvania
Andy OctiZ,	Plaintiff's First Set of
Plaintiff,	Interrogatories To Defendants
٧.	Deposition upon written question
10:5. Black sheer	Civil Action # 21-CV-3101
10: A. Jones	
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Cc Filed on 7-10-23
ipersonal copy
2.) EASTERN DISTRICT
3.) WAS NOT ABLE TO GIVE a copy to DEFENDANT'S CAWYERS.

(E.) If plaintiff was to set up a Deposition to ask defendants
questions under eath would you tell the truth even if deep day
you know you are guilty?
3.) Did you have any motive or intentions on conducting any
type of wrongful action against Plaintiff?
7.) Did you tell any immates on the pad/unit where incident
happen that plaintiff was telling that cause inmates to
attack plaintiff?
10.) DID you ever give up any personal information like plaintiffs
addresses or phone #5 or changes that plaintiff was inconcerated
for to any inmates?
11.) After a legal visit that plaintiff have with P-I-L-P at any
time did you retailate against plaintiff any form or fashion?
12.) DEPENDENT OPEN the door to plaintiff cell to let two
Inmate's to attack plaintiff If So, why?
13.) Did Dependant's have a good relationship with plaintiff if
ues or no why?
14.) Do you follow the rules that are provided to the employee's
that work in the philadelphia Dept. OF prisons?
15.) IF Camera Footage is Fourded would you provide it to the
Courts ?
16.) The day before, the plaintiff gotten punched or smack in the
Pace = in the yard did Defendant Clo: A Jones on up to that cell#1
to state plaintiff told on Dependent's?
17.) Did Defendants ever have any type of favorites on treating
favorite inmates different from others?
18.) Do Defendant have any law suit or reported misconduct or bod
betavior while, employed at a lob orect?
19.) DiD enic Michail and Dontea Parker have a seperation from
each other if so, when did the Seperation expire?
20.) During Dean plaintiff reported the tincident's was both
defendants aware of the reports plaintiff made in the prison
plaintiff was confined?
21) Do Dacedante base a montal ligality last a constal
21.) Do Defendant's have a mental Health history if so, what
where the diagnosis or treatment?
22.) Do Dependant's ever had a bad behavior reported
in the past?
23.) Did Dependant'S HAVE INMATE PASS BUT MAIL OUT
BEFORE?
24.) DID DEFENDANTS HAVE EVER HAD INMATE'S GO INTO
EACH OTHER CEU'S THAT DIDN'T BELONG, THERE?
\$25.) DID DEFENDANT'S EVER PROMOTED VIOLENTS?
I DECLARE UDDER PENALTY OF PRETURY THAT THE FOREGOING
TRUE AND CORRECT.
EXECUTED AT SOMERSET, PA ON 7-10-23 and Company
ANDIA ORTIZ
HUDIA INCLE

SCHERSET, PA. ISSID-COO 1590 walters mill RD

Name AUDY ORTIZ

Number QN-9897

Smart Communications/PADOC

SCI. SOMERSET

COURT OF DENSEYLANTA JAMES A. BYRNE U.S. COURTHOUSE COURT DISTRICT OF COURTS, EDDA GOI MAINET STREET DYSTRICT STATES DOOM: 2409 EASTERS UPITIED CLERK

PHYMADELPHIA, PA-19106

APPLICATION OF THE PARTY OF THE